

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA ,	:	
	:	
vs.	:	3:CR-04-373
	:	
DAVID M. RHODES,	:	JUDGE KOSIK
	:	
Defendant.	:	ELECTRONICALLY FILED

REQUEST OF THE ACCUSED
PURSUANT TO FRE 404(b)

Defendant, David M. Rhodes, by his attorney, Patrick A. Casey,
Esquire of Myers, Brier and Kelly, LLP, requests of the prosecution reasonable
notice in advance of trial the general nature of any evidence of “other crimes,
wrongs or acts” pursuant to FRE 404(b) that the prosecution intends to attempt to
introduce into evidence.

Authority:

United States v. Himelwright, 42 F.3d 777, 783 (3d Cir. 1994).

Respectfully submitted,

/s/ Patrick A. Casey
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Date: July 21, 2006

CERTIFICATE OF SERVICE

I, Patrick A. Casey, Esquire, do hereby certify that I served a copy of the foregoing **Brief in Support of Rhodes' 404(b) Motion to Exclude Evidence** as follows:

ELECTRONIC MAIL

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FIRST-CLASS MAIL

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/s/Patrick A. Casey
Patrick A. Casey, Esquire

Date: July 21, 2006